

EXCEPTIONS
OPEN MEETING AGENDA ITEM
BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

LEA MÁRQUEZ PETERSON, Chairwoman
SANDRA D. KENNEDY, Commissioner
JUSTIN OLSON, Commissioner
ANNA TOVAR, Commissioner
JIM O'CONNOR, Commissioner

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
A RULING RELATING TO ITS 2021 DEMAND
SIDE MANAGEMENT IMPLEMENTATION
PLAN

Docket No. E-01345A-20-0151

**Comments & Proposed Amendment of Diné
CARE, Tó Nizhóní Ání, and Black Mesa Trust**

**Comments and Proposed Amendment of Diné CARE, Tó Nizhóní Ání, and Black Mesa Trust
on the Staff Recommended Opinion and Order on Arizona Public Service Company's
2021 Demand-Side Management Plan**

Diné CARE, Tó Nizhóní Ání, and Black Mesa Trust appreciate the opportunity to submit these comments on Staff's Recommended Opinion and Order (ROO) on Arizona Public Service Company's (APS) 2021 Demand Side Management (DSM) Plan.

First of all, we thank the Commission for its leadership in promulgating Decision No. 78052¹ last month, directing APS to, "Implement a budget of at least \$1,000,000 annually for the Tribal Communities Energy Efficiency Program no later than January 1, 2022." This important directive recognizes the critical need to boost energy efficiency investment to support the APS customers of the Navajo Nation and the Hopi Tribe who are and have been impacted by the operations and retirement of the Navajo Generating Station.

We are concerned that the Staff ROO is contrary to this decision in that it would delay the increased budget for this program until the Commission reviews and approves APS's 2022 DSM Plan. Notably, it has sometimes taken years for the Commission to approve a utility's DSM plan. Consequently, the Commission Staff recommendation could indefinitely delay the expansion and delivery of this much-needed program.

With that, we urge the Commission to consider our proposed Amendment 1, which would ensure that timeline for the expansion of the Tribal Communities Energy Efficiency Program is consistent with ACC Decision No. 78052.

Sincerely,

Adella Begaye
Diné CARE

Cliff Johns
Black Mesa Trust

Nicole Horseherder
Tó Nizhóní Ání

Ben Nuvamsa
Former Hopi Tribal Chairman

¹ <https://docket.images.azcc.gov/0000203980.pdf?i=1625677736814>

Proposed Amendment of Diné CARE, Tó Nizhóní Ání, and Black Mesa Trust

TIME/DATE PREPARED:

COMPANY: Arizona Public Service Company **AGENDA ITEM NO.:** 30

DOCKET NO.: E-01345A-20-0151 **OPEN MEETING:** July 13, 2021

Purpose: To ensure that the timeline for the expansion of the Tribal Communities Energy Efficiency Program is implemented consistent with ACC Decision No. 78052, dated June 24, 2021.

At Page 26, DELETE Lines 24-26 and INSERT NEW ORDERING PARAGRAPH:

“IT IS FURTHER ORDERED that Arizona Public Service Company shall implement the Expanded Tribal Communities Energy Efficiency Program consistent with ACC Decision No. 78052.”

**** MAKE CONFORMING CHANGES**